

GENERAL TIRE COMMUNITY
FEDERAL CREDIT UNION
2338 STATE ROUTE 45 NORTH
MAYFIELD, KY 42066

March 19, 2009

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

RE: Advanced Notice of Proposed Rulemaking (ANPR) to 12 CFR Part 704

Dear Ms. Rupp:

On behalf of the management and Board of General Tire Community Federal Credit Union, I would like to take this opportunity to comment on the recently issued Advance Notice of Proposed Rulemaking (ANPR) to 12 CFR Part 704.

We commend the NCUA for allowing natural person credit unions the opportunity to express our thoughts and viewpoints as a part of this evaluative process.

General Tire Community Federal Credit Union is a \$15 million in assets, has nearly 3,000 members, and serves anyone who resides, is employed, worships, attends schools or volunteers in Graves County, KY. We are currently members of Kentucky Corporate FCU and use the following services from Kentucky Corporate:

Settlement, ACH Receipt, International Wires, Domestic Wires, Line of Credit, Investments, SimpliCD, Security Safekeeping, Check Collection, Coin and Currency, Bill Payment, BSA Training, Member Share Draft Clearing, Over-Night Daily Account, Money Market Share Account, Membership Capital Account and Economic workshops.

We feel that Kentucky Corporate does an excellent job with all the services that they offer us. These services are very important to us as we use most of them on a daily basis.

If Kentucky Corporate did not exist, we would have to seek other financial institutions to aid us in these services. We would, more than likely, be paying higher prices to get these services elsewhere, and how fast could we find other institutions to take on the services we would need to carry out our day-to-day business?

Corporate credit unions are a critical component of the credit union movement. Kentucky Corporate plays a unique supportive role in helping us to survive, compete, and thrive in a highly competitive marketplace as an individual financial institution.

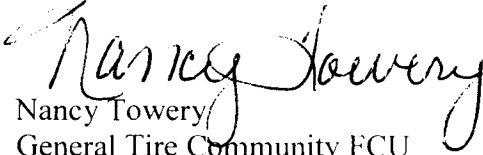
We take our membership in Kentucky Corporate very seriously. We live the credit union movement message of cooperative ownership in our credit union. We value the relationship we have with Kentucky Corporate because they help us do a better job in servicing our members. They have proven time and again that they care about our members and our survival.

We respectfully ask of NCUA that any plan addressing corporates should respect the individuality of each corporate while focusing on appropriate regulatory requirements for all.

In closing, we appreciate the opportunity to comment regarding the future of the corporate system and understand that sound and prudent judgment dictates that NCUA and the industry carefully review the role and structure of the corporate system going forward.

We encourage the agency to keep our views and needs in mind regarding the new regulation as we feel a healthy and strong corporate system is essential to assist us in serving our members.

Sincerely,


Nancy Towery
General Tire Community FCU
Manager